

**Johnston A. Mitchell**, OSB No. 92406  
johnstonm@mcewengisvold.com  
McEWEN GISVOLD LLP  
1600 SW Sixth Avenue  
Portland, OR 97204  
Telephone: (503) 226-7321  
Facsimile: (503) 243-2687

CLERK US BANKRUPTCY COURT  
DISTRICT OF OREGON

'06 JUN 23 P3:56

LODGED \_\_\_\_\_ REC'D \_\_\_\_\_  
PAID 220 DOCKETED \_\_\_\_\_

Of Attorney for Debtor Richard Ray Mabe

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF OREGON

In re:

RICHARD RAY MABE,  
  
Debtor.

Bankruptcy Case No. 05-30317-rld7

**DEBTORS' MOTION TO REOPEN CASE**

Debtor Richard Ray Mabe ("Debtor") moves to reopen this bankruptcy to avoid a judicial lien. A case can be reopened to avoid a judicial lien. *In re Chabot*, 992 F.2d 891 (9th Cir. 1993) (reversed on other grounds by Bankruptcy Reform Act of 1994). The court entered an Order Discharging Debtors; Order Discharging Trustee and Closing No Asset Estate on May 6, 2005. Debtor has paid any additional filing fee. The attached certificate

///

///

///

///

///

///

of service lists Debtors' current mailing addresses. Debtor makes this motion pursuant to 11 U.S.C. § 350(b), Bankruptcy Rule 5010 and 9024, and LBR 5010-1.

DATED: June 23, 2006

McEWEN GISVOLD LLP

By: 

Johnston A. Mitchell, OSB No. 92406

Telephone: (503) 226-7321

Of Attorneys for Debtor Richard Ray Mabe

**CERTIFICATE OF SERVICE**

I hereby certify that on June 23, 2006, I served a copy of the foregoing **DEBTOR'S MOTION TO REOPEN CASE** on the parties at the addresses listed below by mailing full, true and correct copies thereof in sealed, first-class, postage prepaid envelopes and deposited in the United States Postal Service at Portland, Oregon, and as shown below:

Richard Ray Mabe  
10229 S. Comer Creek Drive  
Molalla, Oregon 97038

US Trustee  
620 S.W. Main Street, Room 213  
Portland, Oregon 97205

Chapter 7 Trustee  
Michael A. Grassmueck, Inc.  
P.O. Box 5248  
Portland, Oregon 97208-5248

Dated June 23, 2006

McEWEN GISVOLD LLP

By: 

Johnston A. Mitchell, OSB No. 92406

Telephone: (503) 226-7321

Of Attorneys for Debtor Richard Ray Mabe